

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,
Plaintiff,

v.

AMAZON.COM, INC., AMAZON.COM
SERVICES LLC., and AMAZON WEB
SERVICES, INC.,
Defendant.

Case No. 7:24-cv-00030-ADA-DTG

JURY TRIAL DEMANDED

UNOPPOSED MOTION TO EXTEND THE STAY PENDING TRANSFER

Plaintiff VirtaMove, Corp. files this Unopposed Motion to Extend the Stay of All Deadlines Pending Transfer.

Magistrate Judge Gilliland issued an order granting transfer to the NDCA but staying the actual transfer of this case until February 22, 2025 “to allow Plaintiff time to appeal this decision if it chooses.” Dkt. 87 at 6. VirtaMove then filed objections to Judge Gilliland’s order. Dkt. 89. This Court has already extended the stay of transfer until May 23, 2025 to allow time for appeal. Dkt. 94. However, VirtaMove’s objections are still awaiting a ruling from the District Judge. If Judge Gilliland’s transfer order is not reversed by the District Judge, then VirtaMove intends to petition for a writ of mandamus.

Even if the District Judge were to immediately rule on VirtaMove’s objections, the mandamus process is still expected to need longer than May 23, 2025 before a ruling from the Federal Circuit. Thus, VirtaMove requests that the stay of transfer be extended by another three months, until August 23, 2025. The parties conferred regarding this request and the request is unopposed.

Dated: May 7, 2025

Respectfully submitted,

By: /s/ Qi (Peter) Tong

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Attorneys for Plaintiff VirtaMove, Corp.

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that on May 7, 2025, I electronically filed the foregoing document using the CM/ECF system which will send notifications to all parties of record.

May 7, 2025

/s/ Qi (Peter) Tong
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CERTIFICATE OF CONFERENCE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-7(G), I hereby certify that I conferred with opposing counsel, and the relief sought herein is unopposed.

May 7, 2025

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